

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	17-cr-64-DWF-KMM
)	
v.)	UNOPPOSED MOTION FOR
)	TEMPORARY MODIFICATION
EDWARD S. ADAMS,)	OF EDWARD ADAMS'S
)	PRETRIAL RELEASE
Defendant.)	CONDITIONS

Mr. Adams respectfully requests that the Court permit him to travel with his wife to visit his minor son during his son's semester abroad in Switzerland, from October 10, 2018 to October 26, 2018. A motion is necessary because the Court's Order Setting Conditions of Release (ECF 6), dated March 23, 2017, provided that Mr. Adams could only travel within the United States, and required him to surrender his passport to Probation and Pretrial Services. Mr. Adams asks that the Court temporarily relieve those conditions so that he may visit his son abroad. The government has stated that it does not oppose this motion.

ARGUMENT

The original indictment against Mr. Adams was returned on March 22, 2017, charging him with mail and wire fraud relating to the operation of a family business. Mr. Adams is fifty-five years old, and has lived in Minnesota and been a member of the University of Minnesota Law School faculty for the past twenty-five years. He and his wife have one son, who is currently fifteen years old. He has never before been charged

with a crime. Accordingly, the Court released Mr. Adams on personal recognizance, with an unsecured bond. The Order Setting Conditions of Release required Mr. Adams to surrender his passport and provided that Mr. Adams's travel "is restricted to the United States." (ECF 6).

Mr. Adams's fifteen-year-old son is currently participating in a semester abroad program in Zermatt, Switzerland, which runs from September 7, 2018, until December 5, 2018. Mr. Adams wishes to travel with his wife to visit their son from October 10, 2018, through October 26, 2018. He would fly into and out of Zurich, Switzerland.

Mr. Adams has followed all conditions of his pretrial release for the past eighteen months, has deep ties to Minnesota, and has no prior criminal history. There is no reason to believe that Mr. Adams will flee the United States. Accordingly, Mr. Adams asks that this motion be granted.

CONCLUSION

For the reasons stated, Mr. Adams requests that the Court temporarily relieve the conditions of release that required the surrender of his passport and restricted his travel to the United States, so that he may visit his young son in Switzerland between October 10, 2018, and October 26, 2018.

Dated: September 13, 2018

Respectfully submitted,

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